

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MMAS RESEARCH, LLC,

Plaintiff,

vs.

THE CHILDREN'S HOSPITAL
CORPORATION, et al.,

Defendants

Civ. A. No. 1:24-cv-12108-DJC

DECLARATION OF THEODORE J. FOLKMAN

I, Theodore J. Folkman, make the following declaration:

1. I am counsel to the defendant, The Children's Hospital Corporation, and to Dr. Jacob Hartz. I was admitted to the bar of this Court in 2003 and have been continually in good standing since that time.
2. Attached to this declaration as Exhibit 1 is a true copy of an email I received from Mr. Coleman on October 27, 2025. I have omitted the attachment and have redacted the confidential settlement offer contained in the email.

I declare that the foregoing is true and correct. Executed on January 29, 2026.

/s/ *Theodore J. Folkman*